

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

UMG RECORDINGS, INC., et al.,)	
)	
Plaintiffs,)	
)	
vs.)	No. 1:17-cv-00365-DAE
)	
GRANDE COMMUNICATIONS)	
NETWORKS LLC,)	
)	
Defendant.)	

**DEFENDANT GRANDE COMMUNICATIONS NETWORKS LLC'S
NOTICE OF OBJECTIONS TO PLAINTIFFS' AFFIRMATIVE DEPOSITION
DESIGNATIONS AND EXHIBIT LIST**

Pursuant to Local Rule CV-16(g) and the Court's Order Setting Jury Selection/Trial and Related Deadlines (ECF No. 366), Defendant Grande Communications Networks, LLC ("Grande") submits the attached Objections to Plaintiffs' Affirmative Deposition Designations (ECF No. 376-6) and Objections to Plaintiffs' Exhibit List (ECF No. 376-4). Grande reserves the right to separately contend that Plaintiffs' proposed exhibits and deposition designations should not be admitted pursuant to its forthcoming motions *in limine*.

With respect to Plaintiffs' Affirmative Deposition Designations, Grande's Objections are attached as Exhibit 1 and defined as follows:

Code	Objection/Authority
F	Foundation/Lack of Personal Knowledge (Fed. R. Evid. 104, 602, 901)
C	Completeness/Context (Fed. R. Evid. 106)
O	Improper Opinion Testimony by Lay Witness (Fed. R. Evid. 701)
LC	Legal Conclusion (Fed. R. Evid. 403, 701–04)
R	Relevance (Fed. R. Evid. 402)
P	Unfairly Prejudicial/Confusing/Misleading (Fed. R. Evid. 403)
H	Hearsay (Fed. R. Evid. 802)
IF	Improper Form of Question

With respect to Plaintiffs' Exhibit List, Grande's Objections¹ are attached as Exhibit 2 and defined as follows:

Code	Objection/Authority
H	Hearsay (Fed. R. Evid. 802)
S	Improper Summary (Fed. R. Evid. 1006)
B	Best Evidence Rule (Fed. R. Evid. 1002)
F	Foundation (Fed. R. Evid. 901)
O	Improper or Untimely Expert Testimony (Fed. R. Evid. 702; Fed. R. Civ. P. 26(b)(2); Scheduling Order, ¶ 2 (ECF No. 66))
ID	Insufficient Identification (the description of the exhibit is insufficient to allow Grande to locate it without undue burden, and/or the exhibit appears not to have been timely or properly produced in discovery)

¹ Grande offers these Objections without regard to Plaintiffs' descriptions of identified exhibits, which are in some instances argumentative or otherwise inconsistent with the document at the identified bates number(s).

Dated: December 30, 2021

By: /s/ Richard L Brophy

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